# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA

KENNETH ANDREW COLBAUGH,	)
Individually and as Surviving Spouse	)
of Tabitha Marie Colbaugh f/k/a	)
Tabitha Marie Smith, et. al.	)
	) CASE NO. 1-24-cv-151
Plaintiffs,	)
VS.	) JURY DEMAND
	)
MEIGS COUNTY, et. al.,	)
Defendants.	)
	) CONSOLIDATED
TABITHA MARIE SMITH (Deceased),	)
By and through her adult child	)
NATHAN ALEXANDER SMITH, et. al.,	) CASE NO. 1:24-cv-104
Plaintiffs,	)
Vs.	)
MEIGS COUNTY GOVERNMENT, et. al.	)
Defendants.	)

# JOINT STIPULATION FOR EXTENSION OF TIME TO ANSWER AMENDED COMPLAINT [DOC. 52]

Comes now undersigned counsel for all parties and gives notice to the Court that the named Defendant, Estate of Robert J. Leonard, has requested an extension of time to respond to Plaintiff Smith's Amended Complaint filed on May 30, 2024 (Doc. 52), to which all counsel has agreed, and these parties have further agreed to stipulate that the Estate of Robert J. Leonard, shall be granted an extension up to and including July 12, 2024 with which to file an answer or responsive pleading to Plaintiff Smith's Amended Complaint (Doc. 52).

This stipulation is made pursuant to *Rules 6(b) and 12(b)* of the *Federal Rules of Civil Procedure* and E.D. Tenn. L.R. 12.1 (a).

### Respectfully Submitted,

DAVIS & HOSS, P.C.

#### s/ Janie Parks Varnell

Janie Parks Varnell, BPR #031256 Edith Logan Davis, BPR# 038138 850 Fort Wood Street Chattanooga, TN 37403 (423) 266-0605 Attorneys for Estate of Robert J. Leonard

**THOMAS & THOMAS** 

#### /s/ Michael Mason Thomas

W. Neil Thomas, III, BPR #4536 Michael Mason Thomas, BPR #29423 6148 Lee Highway, Suite 115 Chattanooga, TN 37363 Attorneys for Plaintiff

FLORES LAW OFFICE

#### /s/ Robin Ruben Flores

Robin R. Flores, BPR #20751 4110 Brainerd Road, Suite A Chattanooga, TN 37411 Attorney for Plaintiff

**OLIVER BELL GROUP** 

#### /s/ Alyson Oliver

Alyson Oliver, MI State #P55020 50 W. Big Beaver Road, Suite 200 Troy, MI 48084 Attorneys for Plaintiff

MICHEL & WARD, P.C.

## /s/ Alix C. Michel

Alix C. Michel, BPR #24243 David J. Ward, BPR #13449 735 Broad Street, Suite 406 Chattanooga, TN 37402 Attorneys for Meigs County Government